

# Fact Sheet



## For Final Significant Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on March 25, 2011.

Permit Number: **R30-09700029-2011**  
Application Received: **August 12, 2015**  
Plant Identification Number: **03-54-097-00029**  
Permittee: **Weyerhaeuser NR Company**  
Facility Name: **Buckhannon**  
Mailing Address: **100 TJM Drive, Buckhannon, WV 26201**

Permit Action Number: *SM01*      Revised: February 17, 2016

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Physical Location:	Buckhannon, Upshur County, West Virginia
UTM Coordinates:	568.0 km Easting • 4316.50 km Northing • Zone 17
Directions:	From Charleston, take Interstate 79 North to the Weston/Buckhannon Exit (Exit #99). Proceed on route US 33 East towards Buckhannon, approx. 14 miles. After passing Route 20 (Phillipi/Buckhannon) Exit, take the 2 <sup>nd</sup> Exit of the left onto Industrial Park Road (Route 15/33). Continue on Industrial Park Road for approx. 1 mile until coming to stop sign, plant is straight ahead.

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### Facility Description

Weyerhaeuser NR Company (Weyerhaeuser) is an engineered wood products facility covered by Standard Industrial Classification (SIC) Code 2493 and the North American Industry Classification System (NAICS) Code 321219. The facility has the potential to operate twenty-four (24) hours per day, seven (7) days per week and fifty-two (52) weeks per year. The facility consists of one (1) wood-fired furnace, one (1) propane furnace, two (2) veneer dryers, three (3) wood presses, six (6) storage tanks of various sizes, six (6) baghouse systems, one (1) ESP, and two (2) spray booth.

This modification is to incorporate changes made to R13-1843C for the installation of two (2) storage tanks (Emission units: 005-07 and 005-08) and a parallam sealer spray booth (Emission Unit: 005-09).

## Emissions Summary

This modification results in the follow change in emissions:

Pollutant	Change in Potential Emissions (+ or -), TPY
PM(methylene diisocyanate (MDI) – HAP)	+12.2

## Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of Nitrogen Oxides (NO<sub>x</sub>), Carbon Monoxide (CO) and Volatile Organic Compounds (VOC), over 10 tons per year of a single HAP and over 25 tons per year of aggregate HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Weyerhaeuser NR Company is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

## Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45 CSR 7	Prevention of PM from Manufacturing Sources.
	45CSR13	Permits for Construction, Modification, Relocation, and Operation of Stationary Sources of Air Pollutants.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants
	40 CFR 63 Subpart DDDD	National Emission Standards for Hazardous Air Pollutants from Plywood and Composite Wood Products Facilities.
State Only:	45 CSR 4	No Objectionable Odors.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

## Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-1843C	November 25, 2015	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

### **Determinations and Justifications**

This modification is to incorporate changes made to R13-1843C for the installation of two (2) storage tanks (Emission units: 005-07 and 005-08) and a parallam sealer spray booth (Emission Unit: 005-09).

Permit R13-1843C also changed from the old R13 permit format to the new R13 permit format. Due to this, all conditions in the Title V Permit which cited R13-1843 had to have their citations updated.

The following changes were made based on the changes made in R13-1843C:

#### 1.1 Emission Units

- Added the following emission units to the Emission Units table: 005-07 (Sealer Bulk Tank), 005-08 (Sealer Day/Mix Tank), and 005-09 (Parallam Sealer Spray Booth). The Parallam Sealer Spray Booth (005-09) and ancillary equipment are subject to 45CSR7 and 40 C.F.R. 63 Subpart DDDD.

#### 3.0 Facility Wide Requirements

- Added Condition 3.1.34 which gives the emission limitations for emission units: 005-07, 005-08, and 005-09. Compliance with the applicable emission limits of 45CSR§7-4.1 were streamlined by showing compliance with this condition.
- Added Conditions 3.3.5, 3.3.6, 3.3.7, and 3.3.8 since the conditions were added to R13-1843C. The addition of condition 3.3.5. made the modification of condition 3.2.3 necessary, for reasons noted later.
- The R13 permit condition cited for Title V condition 3.4.6 was left out of the R13 permit when its format was updated. This condition is used to show compliance with the Title V permit conditions 3.1.25, 3.1.26, and 3.1.27, therefore the condition remains but the citation 45CSR§30-5.1.c. was added and the R13 citation was deleted.
- Condition 3.1.32 content was removed and the condition number reserved, since 45CSR42 has been repealed and is no longer an applicable requirement.
- Condition 3.2.3 contained visible emission monitoring requirements for emission units: 003-01, 004-02, 004-03, 004-05, 005-03, 005-04, and 005-05. The newly added condition 3.3.5 also contained visible emission monitoring requirements for emission units: 004-02, 004-03, 004-05, 005-03, 005-04, and 005-05, therefore those emission units were removed from the visible emission monitoring requirements of condition 3.2.3.
- The greenhouse gas reporting requirement 3.5.11. was removed and the condition number reserved since 45CSR42 has been repealed and is no longer an applicable requirement.
- Added Condition 3.5.12 which states that the permittee shall comply with all applicable reporting requirements of 40CFR§63.2280 through 40CFR§63.2283.

#### 4.0 Source-Specific Requirements

- Condition B.9 of R13-1843B (which stated that the continuous monitoring system shall meet the requirements of Performance Specification 1 found in 40 C.F.R. Part 60 Appendix B) included as Title V condition 4.2.3. was removed. Since condition 4.2.4. specifies that the procedures under 40 C.F.R. §60.13 shall be used for the installation, evaluation, and operation of the continuous

monitoring system and performance specification 1 is referenced in §60.13 it was felt that the condition served no purpose remaining in the Title V permit since the underlying R13 condition was not included in R13-1843C. Therefore, the condition was removed and condition number 4.2.3. was reserved.

## Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

### **40 CFR 60 Subpart K, Ka, Kb - Storage Vessel.**

The storage tanks defined by this modification consist of one 6,000 gallon storage vessel and one 350 gallon day/mix tank. Subpart K applies to storage vessels constructed, reconstructed, or modified after June 11, 1973 and prior to May 19, 1978. Subpart Ka applies to storage vessels constructed, reconstructed, or modified after May 18, 1978 and prior to July 23, 1984. Subpart Kb applies to storage vessels constructed, reconstructed, or modified after July 23, 1984. The new Storage vessels could potentially be subject to Subpart Kb however, both of these storage vessels are under the applicability threshold of 75m<sup>3</sup>.

### **40 CFR 63 Subpart QQQQ - National Emission Standards for Hazardous Air Pollutants from the Surface Coating of Wood Building Products**

This subpart was evaluated for applicability and found not to apply because of the overlap with 40 C.F.R. 63, Subpart DDDD. According to 40 C.F.R. §63.4681(c)(1) if the surface coating operations are included as part of an affected source under 40 C.F.R. 63 Subpart DDDD, the coating activities are not covered by Subpart QQQQ standards.

### **40 CFR 64 - Compliance Assurance Monitoring**

The Parallam Sealer Spray booth (005-09) has a control device and a PM limit making it potentially subject to 40 C.F.R. 64, but the only pollutant emitted is a PM-HAP (MDI) which makes it an affected source under the PWCP MACT, 40 CFR 63, Subpart DDDD, which would qualify as a 112 exemption under the CAM applicability section 40 C.F.R. §64.2(b)(1)(i).

### **45 CSR 21 - To Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds.**

The facility is not located in a WV County designated applicable to the RACT requirements of this state rule.

### **45 CSR 27 - To Prevent and Control the Emissions of Toxic Air Pollutants.**

This rule is applicable to all Toxic Air Pollutants listed in this regulation and defines Best Available Control measures to abate emissions from sources exceeding the applicability thresholds. The MDI emissions from the proposed modification are not listed as a regulated pollutant under this State Rule.

## Request for Variances or Alternatives

None.

## Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

## Comment Period

Beginning Date: Friday, January 15, 2016  
Ending Date: Tuesday, February 16, 2016

## **Point of Contact**

All written comments should be addressed to the following individual and office:

Robert Mullins  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1243 • Fax: 304/926-0478  
Robert.A.Mullins@wv.gov

## **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

## **Response to Comments (Statement of Basis)**

The following comment was received from EPA Region III in regards to this Significant Modification.

Comment:

There appears neither a requirement to keep track of material contained nor means to calculate the emissions from the tanks in order to assure compliance with 3.1.34.

Response:

The PM limits on the tanks are 0.0 lb/hr based on maximum potential to emit (PTE) from EPA Tanks Version 4.0. On the sealant spray booth, the PM limit is higher than the maximum hourly PTE derived using the maximum hourly throughput possible based on the design limitations of the spray booth. The spray booth is a total enclosure and emissions are routed to a filter. Other than in cases of malfunction of the control device on the spray booth, the equipment cannot exceed the given limits. The Permit contains recordkeeping requirements for malfunction and maintenance of control devices (filter) in conditions 3.3.7 and 3.3.8. Therefore, no changes were made to the permit as a result of EPA Region III's comment.